

UNITED STATES DISTRICT COURT
DISTRICT OF RHODE ISLAND

THE ESTATE OF YARON UNGAR, et al.

vs.

C.A. No. 00 - 105L

THE PALESTINIAN AUTHORITY, et al.

PLAINTIFFS' FIRST REQUEST FOR PRODUCTION OF DOCUMENTS
TO DEFENDANT THE PALESTINIAN AUTHORITY

Now come the plaintiffs in the above-entitled matter and pursuant to Fed. R. Civ. P. 34 hereby request defendant, the Palestinian Authority, to produce within thirty (30) days hereof the following documents to plaintiff's counsel.

The word "account" as used herein means any checking, savings, investment, deposit, brokerage account, stock, and/or bond of any nature and kind, in any bank, brokerage, or financial institution.

The word "HAMAS" refers to the Islamic Resistance Movement (a.k.a. "Harakat Al-Muqawama Al Islamiyya") including its Dawa and military wings.

The word "Palestinian Authority" means The Palestinian Authority, Palestine National Authority, Palestinian Interim Self-Government Authority, Palestinian Legislative Council, General Intelligence Services, Preventative Security Services, Palestinian Police, Palestinian National Fund, Department of Finance, Palestine Monetary Fund, Joint Investment Fund, Palestinian National Authority Pension Fund, P.E.C.D.A.R., P.C.S.C., P.A., SAMED, Palestine Monetary Authority, P.M.A., Investment Department, and any agency, instrumentality, and/or subdivision of same.

1. All correspondence, memoranda, notes, letters, communiques, and other written exchanges between Palestinian Authority officials and HAMAS officials and members for the period 1993 to 1997.

2. All written agreements between the Palestinian Authority and/or Palestinian Authority officials, and HAMAS and/or HAMAS officials, including but not limited to those of October 12, 1995, December 22, 1995 and subsequent agreements, modifications, amendments, and joint communiques relating thereto.

3. All records evidencing the registration and licensing of HAMAS by the Palestinian Authority, including but not limited to all files of the Palestinian Authority voluntary organization registry, permits, licenses, and correspondence.

4. Any and all decrees or orders issued by the Palestinian Authority outlawing, banning, or curtailing HAMAS activity.

5. All records and documents pertaining to the provision of financial or other material assistance to persons, or to the families of persons, who were captured or killed while carrying out, or while attempting to carry out, activities on behalf of HAMAS or any other Palestinian organization.

6. Any and all decrees, orders, directives and other documents made, issued or published by the Palestinian Authority which regulate the provision of financial or other material assistance to persons, or to the families of persons, who were captured or killed while carrying out, or while attempting to carry out, activities on behalf of HAMAS or any other Palestinian organization.

7. Any and all records, documents, decrees, orders, directives and other documents pertaining to the operating guidelines, purposes and functions of the "Ministry of Prisoner Affairs" headed by Hisham Abdel Razeq or other persons.

8. Any and all records and documents pertaining to budget and expenditures of the "Ministry of Prisoner Affairs" headed by Hisham Abdel Razeq or other persons, including but not limited to the criteria for the distribution of financial support, the types and amounts of support provided, and the names and addresses of individual recipients of said support.

9. All press statements, press releases, official statements in Arabic, English, Hebrew, and French issued by Palestinian Authority Chairman Yasser Arafat from 1993 to 2000 mentioning HAMAS and/or attacks carried out by HAMAS and or operatives of HAMAS.

10. All advertisements sponsored by the Palestinian Authority soliciting, recruiting, and/or offering financial support or payment to "martyrs."

11. All documents utilized and/or reviewed in answering Plaintiffs' First Set of Interrogatories and First Set of Request for Admissions propounded to the Palestinian Authority.

12. All documents the Palestinian Authority, intends to introduce at trial.

13. The personnel files of Imad Abbas, Abd al-Khader Amar, Raid Bashiti, Adnan al-Gol [aka Adnan al-Rol], Atef Hamadan, Bassam Issa, Sufian Abu Jadian, Kamal Khalifa, Yasser Yusef Khasin, Salaam Abu Maarouf, Yusuf Malhi, Mahmud A. Sanwar, Abd al-Fatah Sitri, and Osama Abu Taha.

14. All agreements executed between Salim Al-Za'nun and Khalid Mash'al.

15. All records indicating the Palestinian Authority's payment of employees and/or staff of Al-Hayat Al-Jadida from 1993 to the present.

16. All written requests made by the governments of the United States and Israel to the Palestinian Authority to act against HAMAS and/or to arrest and/or detain and/or surrender HAMAS members.

17. All records and statements with respect to any and all accounts in the United States standing in the name of the Palestinian Authority or any agency, subdivision and instrumentality under its control in which there were any sums on deposit at any time or from time to time in the past five (5) year period.

18. Regarding Hasan Salameh, all documents pertaining to the Palestinian Authority's grant and/or denial of a license to carry, own, and/or possess a firearm or weapon including but not limited to the application, license, and entire file.

19. All investigative reports, witness statements, and the like pertaining to the murder of Yaron and Efrat Ungar.

20. All documents listing HAMAS members whom the Palestinian Authority has arrested, detained, imprisoned or placed in protective custody.

21. All documents listing all HAMAS members who have been quartered by the Palestinian Authority in barracks or facilities or any type.

22. All documents listing the names and locations of the facilities at which HAMAS members were quartered or detained by the Palestinian Authority.

23. Any and all documents and correspondence relating to requests made by representatives of the United States and Israeli governments to the Palestinian Authority to arrest and imprison HAMAS commander Salah Talachmeh (a.k.a. Nasser Salah Talachmeh).

24. All records and documents relating to the custody and/or detention and/or quartering of Salah Talachmeh (a.k.a. Nasser Salah Talachmeh) in any facility or barracks operated by the Palestinian Authority in Jericho and in any other place.

25. All records and documents relating to the custody and/or detention and/or quartering of Ibrahim Ghanimat in any facility or barracks operated by the Palestinian Authority in Hebron and in any other place.

26. All records and documents relating to the investigation or questioning of Salah Talachmeh (a.k.a. Nasser Salah Talachmeh) by the Palestinian Authority.

27. All records and documents relating to the investigation or questioning of Ibrahim Ghanimat by the Palestinian Authority.

28. All records indicating the dates on which Salah Talachmeh (a.k.a. Nasser Salah Talachmeh) left and entered any facility or barracks operated by the Palestinian Authority.

29. All records indicating the persons who visited and/or met with Salah Talachmeh (a.k.a. Nasser Salah Talachmeh) in any facility or barracks operated by the Palestinian Authority.

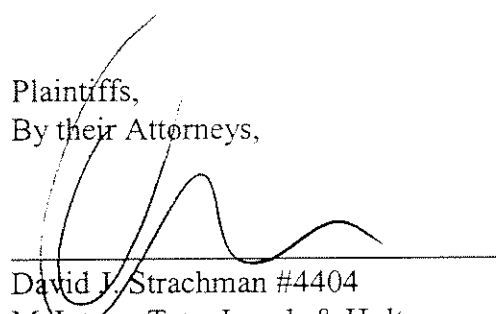
30. All records indicating the persons who were quartered and/or detained and/or in custody concurrently with Salah Talachmeh (a.k.a. Nasser Salah Talachmeh) in any facility or barracks operated by the Palestinian Authority.

31. All records indicating the personnel who operated and were employed at any facility or barracks operated by the Palestinian Authority in which Salah Talachmeh (a.k.a. Nasser Salah Talachmeh) was quartered or was detained.

32. All records of conversations between Salah Talachmeh (a.k.a. Nasser Salah Talachmeh) and Abdel Rahman Ghanimat in any facility or barracks operated by the Palestinian Authority in Jericho or elsewhere which were monitored and/or recorded by the Palestinian Authority, including but not limited to audio copies and transcripts of all recordings.

33. All audio copies and transcripts of any recording made by the Palestinian Authority of the conversation between Salah Talachmeh (a.k.a. Nasser Salah Talachmeh) and Abdel Rahman Ghanimat in which they planned the terrorist attack in which Yaron and Efrat Ungar were killed.

Plaintiffs,
By their Attorneys,



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CERTIFICATION

I hereby certify that on the 24 day of January, 2002, I mailed a true copy of the within

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